

November 13, 2008

Alan L. Harness
Ohio EPA – DAPC
Lazarus Government Center
PO Box 1049
Columbus, Ohio 43216-1049

DELIVERED ELECTRONICALLY: alan.harness@epa.state.oh.us

Re: COMMENTS ON PROPOSED AMENDMENTS TO RULE 3745-21-09

Dear Mr. Harness,

The American Composites Manufacturers Association is please to submit comments on the subject proposed rule, on behalf of our member companies in Ohio. Our comments focus on proposed section HH, which would set VOC emission limits equivalent to Reasonably Available Control Technology (RACT) for the coating of plastic parts for automobiles, transportation-related use, and business machines.

ACMA believes the proposed limits are achievable for Ohio companies that paint reinforced plastic composite parts.

Based on information provided by members, any currently used paints not meeting these limits could be successfully reformulated.

ACMA believes the scope of 21-09 HH should be expanded.

Sources subject to rule 21-09 are explicitly exempt from the provisions of rule 21-07. The uncertain status of SIP approval for 21-07 complicates permitting decisions for companies with coating lines. To alleviate this uncertainty, we request that section HH apply statewide.

USEPA has just issued a final Control Techniques Guideline (CTG) that recommends RACT for the coating of plastic parts. Table 3 of the CTG specifies as-applied VOC content limits (effectively emission limits) for parts other than automotive-transportation or business machines. We believe those limits are achievable by our industry, and request that they be included within HH.

Note that in proposed HH, emission limits are set at different levels and in different ways than they are in the CTG. OEPA must gain approval from EPA Region 5 of 21-09 as a SIP modification before the rule can be fully implemented. Should OEPA apply HH statewide as we have proposed, that would exceed Federal requirements to impose RACT in moderate non-attainment areas. This would support proposed HH emission limits that might

otherwise be challenged as less stringent or otherwise nonequivalent than those recommended as RACT in the CTG.

Thank you for your attention to our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Schweitzer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Schweitzer
Senior Director of Government Affairs
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